

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION

UNITED STATES OF AMERICA, Plaintiff

v. CIVIL ACTION NO. 4:21cv143-DMB-DAS

MISSISSIPPI CONFERENCE OF BLACK MAYORS, Defendant

COMPLAINT

The Plaintiff, United States of America, by and through Clay Joyner, Acting United States Attorney for the Northern District of Mississippi, pursuant to 28 U.S.C. § 3001 et seq., and for its cause of action, states:

I.

Jurisdiction in this case is predicated on 28 U.S.C. § 1345.

II.

The Defendant, MISSISSIPPI CONFERENCE OF BLACK MAYORS (hereinafter referred to as “Defendant”), is a legal entity of Winstonville, Bolivar County, Mississippi, within the jurisdiction of this Court.

COUNT 1

III.

Defendant is indebted to Plaintiff in the principal sum of \$58,000.00 plus interest of \$2,262.26 through July 22, 2020, Administrative costs of \$26,430.46 and penalty charges of \$12,761.59. Said debt is more fully described in Certificate of Indebtedness, a copy of which is attached hereto, made a part hereof and marked as “Exhibit A”.

IV.

Defendant has defaulted on payment of this debt and there is now due and payable on debt owed by Defendant the amount of \$100,184.57 as of October 25, 2021, plus interest at a rate of 1.00% on principal amount until judgment is entered, and then thereafter, interest at the legal rate until paid in full.

COUNT 2

V.

Defendant is indebted to Plaintiff in the principal sum of \$42,031.18 plus interest of \$1,577.80 through July 15, 2020, Administrative costs of \$18,984.80 and penalty charges of \$8,836.33. Said debt is more fully described in Certificate of Indebtedness, a copy of which is attached hereto, made a part hereof and marked as “Exhibit B”.

VI.

Defendant has defaulted on payment of this debt and there is now due and payable on debt owed by Defendant the amount of \$71,967.35 as of October 25, 2021, plus interest at a rate of 1.00% on principal until judgment is entered, and then thereafter, interest at the legal rate until paid in full.

VII.

This amount is a debt to the United States as defined in the Federal Debt Collection Procedures Act of 1990, 28 U.S.C. §§ 3001-3308. See 28 U.S.C. § 3002(3)(B).

WHEREFORE, United States of America, Plaintiff, prays for judgment against the Defendant, MISSISSIPPI CONFERENCE OF BLACK MAYORS, in the amount of

\$172,151.92, plus interest, costs, a \$400.00 filing fee pursuant to 28 U.S.C. § 2412(a)(2) and all other proper relief.

Respectfully Submitted,

CLAY JOYNER
Acting United States Attorney

By: /s/ J. Harland Webster
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